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WALMART INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EDIE GOLIKOV, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WALMART INC.,

Defendant.

Case No. 2:24-CV-08211-RGK-MAR

Assigned to Honorable R. Gary
Klausner

**DEFENDANT WALMART INC.'S
RESPONSE TO PLAINTIFF EDIE
GOLIKOV'S UNTIMELY
RESPONSE TO MOTION TO
CLARIFY, OR TO DECERTIFY
CLASSES**

Date: July 28, 2025
Time: 9:00 a.m.
Ctm.: 850

Action Filed: September 24, 2024

WALMART'S RESPONSE TO LATE RESPONSE TO MOTION
TO CLARIFY, OR TO DECERTIFY CLASSES

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1 Defendant Walmart Inc. (Walmart) hereby provides notice that—if the Court
2 does not strike plaintiff Edie Golikov’s Response to Walmart’s Motion to Clarify or
3 to Decertify Class (Dkt. No. 86, filed 6:19pm on July 14, 2025) as untimely—
4 Walmart intends to file a Reply within one week, on or before July 21, 2025.

5 Ms. Golikov’s Response was not timely filed. Local Rule 7-9 requires filing
6 of opposition papers “not later than twenty-one (21) days before the date designated
7 for the hearing of the motion.” Walmart’s Motion to Clarify, or to Decertify Classes
8 (the Motion) was noticed and set for hearing July 28, 2025, and remains so after the
9 Court struck the Amended Notice (filed at the request of Counsel for Ms. Golikov,
10 *see* footnote 1 of the Amended Notice) (Dkt. 83.) Her Response was due no later
11 than July 7, 2025, but she did not file her Response until *today*, July 14, 2025.

12 Ms. Golikov’s late-filed Response prevents, in turn, Walmart from filing a
13 timely Reply under the Local Rules, which permit at least one week to reply to the
14 opposition, meaning filing 14 days before the hearing, or today, July 14, 2025. Ms.
15 Golikov’s Response currently leaves fewer than 6 hours for Walmart to file a Reply
16 after Ms. Golikov’s Response. If the Court considers Ms. Golikov’s Response
17 without providing an additional week for Walmart to respond, Walmart would suffer
18 extreme prejudice. Walmart objects to consideration of Ms. Golikov’s one-week-
19 late-filed Response without providing a similar week for Walmart to file its reply.

20 If the Court considers the Response, Walmart intends to file a Reply in
21 support of the Motion—including a response to Counsel’s declaration (Dkt. 86-1)—
22 within one week from today, not later than July 21, 2025.

23
24 DATED: July 14, 2025

DAVIS WRIGHT TREMAINE LLP

25 By: /s/ Jacob M. Harper

26 Jacob M. Harper

27 *Attorneys for Defendant*
28 *Walmart Inc.*

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CERTIFICATION

The undersigned counsel of record for Walmart Inc. certifies that this brief contains 289 words, which complies with the word limit of L.R. 11-6.1 and the Court’s Standing Order.

/s/ Jacob M. Harper
Jacob M. Harper